AGRICULTURAL ANALYSIS

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Prepared for

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SUMMARY OF FINDINGS

A. The project, when compared to against the appropriate Thresholds of Significance, will not have a significant impact to agriculture in San Diego County based upon the following findings.

- The project will not result in the conversion of Soils of Prime Agricultural Farmland.
- The project will not result in the conversion of Prime Farmland or Farmland of Statewide Importance.
- The project will establish parcels sizes that can support agriculture in the future.
- The project will not conflict with agricultural zoning or use regulations.
- The project will not result in a conflict with a County Agricultural Preserve.
- The project will not result in a conflict with a land conservation contract.
- The density proposed by the project will not have an adverse significant impact on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.
- A significant proportion of the existing agriculture on the subject property will not be directly impacted through building pads, roads, or driveways.
- This project, in conjunction with other existing and proposed projects, would not have an impact to agriculture that is cumulatively considerable pursuant to the State CEQA Guidelines.

B. Additionally, the following findings have been made.

- The study area has few advantages for the use of agriculture other than the microclimate. .
- Only 23% of the agriculture on the property will be directly impacted by this proposed development.

- After project implementation, 44.2% of the subject property will remain. This compares with 20.6% of the surrounding area currently in agriculture.

- The average size of the parcels being proposed are such that they are capable of sustaining agriculture and may enhance the future of agriculture on this property. If there is still significant agricultural activity occurring on the subject property, the likelihood of conflicts between the subject property and the agricultural operations on the surrounding area is minimal.

- The San Diego County Board of Supervisors, on February 12, 2003, amended the San Diego County Code of Regulatory Ordinances to require purchasers to be notified in writing that agricultural uses may exist near to property that the buyer is purchasing. The buyer must acknowledge by signature that such agricultural uses are likely to be nearby that may expose the buyer to certain irritations and inconveniences.

I. INTRODUCTION

A. Overview of the Project:

This project proposes a Minor Subdivision with parcels ranging in size from 4.2 to 8.0 acres gross and a density of one dwelling unit per 6 acres gross. The entire property consists of 30 acres, and is located the eastern Bonsall Area (See Figure 1, Regional Location). More specifically, it is located north of the intersection of Mountain View Road and West Lilac Road (See Figure 2, Community Location).

The project will be a 5 parcel Minor Subdivision (4 parcels plus a remainder parcel). There will be no other discretionary permits required for implementation.

B. San Diego County General Plan and Zoning:

The property is within the Estate Development Area (EDA) Regional Plan Category of the San Diego County Regional Land Use Element (See Figure 3, Regional Category). It is located in the Bonsall Community Planning Area and has a plan designation of (19) Intensive Agricultural (See Figure 4, Community Plan Designation). The property is currently classified with the A70 Use Regulation with 2 acre minimum lot size (See Figure 5, Zone Classification).

C. Characteristics of the Subject Property:

The property generally slopes from the north to south and east to west, with elevations as high as 732 feet in the northeastern area to 555 feet in the far southwestern area.

The project area has approximately 13.27 acres or 44.22% of its area in currently in agriculture, with the remaining area vacant. There is currently an agricultural storage building on the remainder parcel that will stay after the division occurs.

After the subdivision, the remaining avocado grove on site will be divided among the individual property owners and each owner will be responsible for their portion of the grove. All parcels will be provided with water from the Rainbow Municipal Water District. The existing irrigation system will be left in tact except for alterations needed to operate the system on individual parcels, with connections to the imported water.

D. Characteristics of the Surrounding Area

1. Land Use

The area to the east, north and west is generally vacant land. The area to the south has some amount of field agriculture. Areas to the west are in slopes generally in excess of 25%, while only a few areas to the north have this amount of slope. Generally areas to the east and south do not have steep slopes.

2. Zoning and General Plan

Zoning:

In terms of the surrounding area, all property within the vicinity is in an A70 zone. However the minimum lot sizes vary from 1 acre to the west and a small area to the north of the subject property. There is a large area of two acre minimum lot sizes to the south, 4 acres to the northeast, and 10 acres to the north and northwest. See Figure 5 for precise locations of the different lot size requirements.

General Plan:

In terms of the surrounding area, all of the property is located within the EDA Estate Development Area Regional Category. Additionally property to the direct west and north has a community plan designation of (18) Multiple Rural Use. Property to the south and east has a community plan designation of (19) Intensive Agriculture. It should be noted that on the east, the Intensive Agriculture Designation is only 320 feet deep, and beyond that to the east, the property becomes Multiple Rural Use.

E. Methods and Survey Limitations:

1. Study Area:

The study area includes the subject property to be developed, as well as all property within 2000 feet of the perimeter of the subject property (See Figure 6). The subject property comprises 30 acres of this area, while the remainder constitutes 474 acres for a total of 504 acres. Previous references to surrounding area refer to the same properties as the study area.

2. Method:

Agricultural uses and other land uses were determined through a combination of several sources. The primary source was a digitized aerial photo taken in February of 2003. This photo was enlarged 800% so that agricultural areas as well as the types of agriculture could be identified. This was supplemented by discussions with the owner and field reviews. Please note that the measurements taken from the aerial photo are two-dimensional and do not account for topography. Therefore there may be slight deviations in some of the acreage figures in rough terrain. However, this method was deemed sufficiently accurate for the broad conclusions desired in this analysis.

Agricultural Areas Impacted were determined by superimposing the areas in agricultural use over the Tentative Parcel Map and using a digital planimeter to measure pads, driveways, and streets. Cuts and fills for streets and pads were also included in these measurements. A listing by parcel of agricultural areas impacted, as well as a listing by streets is found in Appendix A.

Soils information was determined through the San Diego County Important Farmland Map, produced by the California Department of Conservation, and the Soil Survey for the San Diego Area produced by the U.S. Department of Agriculture, Soil Conservation Service.

Climatic Data was determined through use of the University of California Extension Service publication entitled Climates of San Diego County, Agricultural Relationships, as well as information provided in the above-mentioned Soils Survey.

3. Limitations:

   The method was limited by several factors. First, the latest available aerial photos were taken in February of 2003 so that some new planting could have occurred during that time. While this was not a problem for the subject property, there may be some new plantings on other properties, not obvious from the field survey.

   Second, acreages were measured through the use of a digital planimeter. All measurements were taken 3 times and the results averaged, in accordance with accepted practice for this type of instrument. For the broad assumptions of this report, this level of precision is more than sufficient. However, it should be understood that the acreage figures are only close approximations.

F. Thresholds of Significance:

A determination as to the degree of significance of the impact, if any, of each of the following thresholds shall be made. The results of these determinations are to be considered guidelines that, when viewed as a whole in the context of each project, will determine whether a project has a significant impact to agricultural resources.

1. The project will result in the conversion of:

   a. Prime agricultural soils (i.e. an LLC rating I-II or soils rated as good in terms of fertility and suitability for the predominant crop in the vicinity).

   b. Prime Farmland, Farmland of Statewide Importance, or Unique Farmland as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

2. The Project will establish parcel sizes that cannot support future agricultural operations and are not consistent with other parcel sizes in the vicinity that currently support agriculture.

3. The project will result in a conflict in the study area with agricultural zoning or use regulations.

4. The project will result in a conflict in the study area with a County Agricultural Preserve.

5. The project will result in a conflict in the study area with a land conservation contract.

6. The density proposed by the project will have an adverse significant impact on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.

7. A significant proportion of the existing agriculture on the subject property will be directly impacted through building pads roads, or driveways.

8. This project, in conjunction with other existing and proposed projects, would have an impact to agriculture that is cumulative considerable pursuant to the State CEQA Guidelines.

II. SURVEY RESULTS

The following is the data generated through this survey with some preliminary analysis. Corresponding conclusions will be found in Section IV.

A. County General Plan—Agricultural Designations:

The San Diego County General Plan has two designations devoted to agriculture. First is the (19) Intensive Agriculture, and second is the (20) Agricultural Preserves. The subject property has all of its 30 acres designated as (19) Intensive Agriculture. Additionally property to the south as well as a narrow (320 feet) band of property to the east are also in the 19 Designation. None of the property within the study area lies within the (20) General Agriculture.

B. County Agricultural Preserves:

None of the property within the study area, including the subject property, lies within a County Agricultural Preserve.

C. Land Conservation Contracts:

None of the property within the study area, including the subject property, is subject to a land conservation contract.

D. Parcelization:

A review of parcelization within the study area indicates that there are 70 assessor's parcels within the study area, not including the subject property or assessor's parcels created for roadways. These parcels are classified by size on Figure 7 and mapped on Figure 8.

With a minimum parcel size of 4.2 acres and an overall density of one dwelling per 6 acres, the densities and parcel sizes of the proposed development are consistent with up to the 4-8 acre range of parcel sizes. There are 55 parcels or 78% of the parcels in the study area in this range or smaller. Thus the parcel sizes and densities being proposed would not only be consistent with the current general plan and zoning, but would also not be out of character for the area.

E. Land Use:

In general terms, land uses in the study area are either vacant or low-density residential/agricultural uses. The study area consists of 504 acres and agricultural uses occupy approximately 111 acres or 22% of the study area (See Figure 9). If the subject property is excluded, the study area has 474 acres of which 97.75 acres or 20.6% is planted. 393 acres or 79.4 % of the study area is currently not used for productive agriculture.

In terms of the subject property, 16.73 acres or 55.8% of the area is devoted to agriculture. Thus 13.27 acres or 44.2% of the subject property is not in agriculture.

The subject property currently has a larger percentage of land under cultivation (44.2%) than the remainder of the study area (20.6%). The proposed development will directly impact 3.04 acres or 23% of current agricultural uses (See Subsection F). When these 3.04 acres are subtracted from the acres currently used for agriculture, there will be, after implementation of this project, a total of 10.23 acres of agriculture remaining. This also equates to 34.1% of the subject property remaining in agriculture. Accordingly, the percentage of land devoted to agriculture in the surrounding area is 20.6%. Thus even after the implementation of the project, the percentage of land devoted to agriculture on the subject property will be higher than the surrounding area.

F. Agricultural Areas Directly Impacted by the Proposed Development:

A review of the area to be graded in terms of building pads, driveways, fuel breaks, and roads was conducted to determine the amount and type of agriculture that would be directly impacted by the proposed development.

Although this proposal is dependant upon septic tanks and the associated leach fields, the area occupied by the septic tanks and leach fields was not considered a direct impact. Additionally building limitation buffers were not considered direct impacts. This was done pursuant to Appendix G of the CEQA Guidelines which, in discussing an evaluation of Agricultural Resources, suggests the following questions:

Would the project

a) Convert Prime Farmland, Unique Farmland, or Farmland of State of Statewide importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural use?

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

A and c above relate to the conversion of agricultural land to a non-agricultural use. The surface above the leach fields can continue to be used for agricultural purposes as long as root crops such as potatoes or carrots are not grown and, in fact, are highly suitable for agriculture because of the additional moisture and nutrients that will be in the soil. Therefore, placement of leach fields on the subject property will not result in the conversion of any lands to a non-agricultural use, and thus the leach fields were not considered a direct impact to agriculture.

Also, building limitation zones generally permit irrigated and managed plantings within these zones. These planting can include certain types of agriculture. Thus these areas are not lost to agricultural uses.

It was found that the total direct impact to agriculture on the subject property would be approximately 3.04 acres or 10.1% of the total area. Additionally it will impact 23% of the 13.27 acres devoted to agriculture (See Figure 10).

Thus, as stated in Sub-section E above, after the direct impacts to agriculture are taken into account, there will still be 34.1% of the subject property devoted to agriculture.

G. Soils:

Soil Conservation Service:

The U.S. Department of Agriculture, Soil Conservation Service has prepared a Soil Survey for San Diego County. According to this survey there are 6 major soils types within the study area (See Figure 11) which are described below. There are also several other soils types occupying minor amounts of acreage within the study area that have not been discussed:

CmrG: This is a Cieneba very rocky coarse sandy loam formation eroded on slopes of 15-30% and occupies 188.84 acres or 39% of the study area. The location of this formation is found in the northern half of the study area. This soil is not

rated as an Arable Soil by the Coil Conservation Service. This soil is not found on the subject property.

FaE2: This is a Fallbrook sandy loam formation eroded on slopes of 15-30% and occupies 130.91 acres or 28% of the entire study area. This soil occupies 16.2 acres, or 55% of the subject property. The location of this formation is found in the central, southern and south-eastern portions of the study area. This soil is not suited for truck crops, tomatoes or flowers. This soil is rated as fair for avocados because of the soil's surface layer texture. This soil is also rated as fair citrus because of its permeability rate. It has been classified as a VIe-1(19) Capability Rating. Soils in this Capability Rating are rated as low to medium in fertility.

StG: This is Steep-gullied land that is steep and eroding into old alluvium or decomposed rock. Runoff is very rapid, and the erosion hazard is very high. This formation occurs as large individual gullies or as a network of many gullies in areas where the vegetative cover is sparse or has been severely depleted by grazing or fires. This soil occupies 58.14 acres or 11.5% of the entire study area. This soil occupies 10.91 acres, or 37% of the actual subject property. The location of this formation is found in the central and southern portions of the study area. This soil is not rated as an Arable Soil by the Soil Conservation Service.

VsE: This is a Vista coarse sandy loam formation on slopes of 15-30% and occupies 41.27 acres or 8% of the study area. The location of this formation is found in the southwest portion of the study area. This soil is rated as good for avocados, and fair for citrus based on the depth to hardpan. This soil is not suited for truck crops, tomatoes and flowers. This soil has been classified as a VIe-1(19) Capability Rating. Soils in this Capability Rating are rated as low to medium in fertility. This soil is not found on the subject property.

RaC: This is a Ramona sandy loam formation on slopes of 5-9% and occupies 19.49 acres or 4% of the study area. The location of this formation is found in the southern portion of the study area. This soil is rated as good for flowers and is not suitable for avocados. This soil is rated as fair for citrus and truck crops based on the permeability rate of the soil. This soil is also rated as fair for tomatoes based on the surface layer texture of the formation. This soil has been classified as a VIe-1 (19) Capability Rating. This soil is rated

low to medium in fertility. This soil is not found on the subject property.

CmE2: This is a Cieneba rocky coarse sandy loam formation eroded on slopes of 9-30% and occupies 18.26 acres or 4% of the study area. The location of this formation is found in the western portion of the study area. This soil is not rated as an Arable Soil by the Coil Conservation Service. This soil is not found on the subject property.

These six soils types occupy 92.5% of the study area. Of these 6 types, 3 of the soils are rated as not being arable soils. 1 soil is rated as good for avocados and 1 is rated as good for flowers. 1 soil is rated as fair for avocados, 1 for truck crops and 2 soils are rated as fair for citrus. 1 soil is not rated as being suitable for avocados, 2 are not suited for truck crops, 2 are not suited for tomatoes and 2 are not suited for flowers. The non-arable soils in the study area comprise 265.24 acres, or 54.5% of the study area. The soils rated as "good" comprise a total of 60.76 acres, or 12% of the study area.

Two of these soils types occupy 92% of the subject property. Of these soils, 1, covering 37% of the subject property as not being an arable soil. The other soil, occupying 55% of the subject property, is rated as unsuitable for truck farming and fair for avocados and citrus.

Because over half of the soil found in the study area is non-arable, and only 2 of the soil formations are rated as being "good." Thus in terms of the Soil Conservation Service Survey, the soils in the study area mostly range from "not suitable" to "fair". In terms of the subject property, the only arable soil is rated as fair for citrus and avocados.

In terms of fertility, of the 6 predominant soils, only 3 are rated as being arable. These 3 soil formations each have a fertility rating of "low to medium fertility. In terms of the subject property, the arable soil is rated as low to medium in fertility. Thus in terms of the Soils Conservation Service Survey, the soils in the study area are not exceptionally fertile.

H. Important Farmlands:

The California Department of conservation has classified land in California into seven "Important Farmlands Categories". Annotated definitions are found below of the relevant classifications.

Prime Farmland: Land with the best combination of physical and chemical characteristics able to sustain long-term production of agricultural crops.

Farmland of Statewide Importance: Land with a good combination of physical and chemical characteristics for agricultural production, having only minor shortcomings, such as less ability to store soil moisture, compared to prime farmland.

Unique Farmland: Land used for production of the state's major crops on soils not qualifying for prime or statewide importance. This land is usually irrigated, but may include non-irrigated fruits and vegetables as found in some climatic zones in California.

Farmland of Local Importance: Land that meets all the characteristics of prime and statewide, with the exception of irrigation.

Urban and Built-up Land: Residential land with a density of at least six units per ten-acre parcel, as well as land used for industrial and commercial purposes, golf courses, landfills, airports, sewage treatment, and water control structures.

There are also Categories of Grazing Land, Other Land, and Water which have not been defined.

Figure 12 indicates that there are two Important Farmland Categories found on the subject property. Additionally there are in total, five Important Farmland Categories found within the study area.

Unique Farmland:

215.31 acres or 43% of the study area is in the Unique Farmland Category. This Category is found primarily in the southern and central portions of the study area. 58%, or 18.37 acres of the subject property itself is made up of this Category.

Other Land:

198.7 acres or 39% of the study area is in the Other Lands Category. This Category is found primarily in the southern and central portions of the study area. No portion of the subject property falls within this Category.

Farmland of Local Importance:

57.32 acres or 11% of the study area is in the Farmland of Local Importance Category. This Category is found primarily in the central portion of the study area. 42%, or 13.04 acres of the subject property is within this Category.

Urban and Built-Up Land:

17.79 acres or 4% of the study area is in the urban and Built-Up Land Category. This Category is found in the extreme northern portion of the study area as well as the southwestern portion. None of the subject property is within this Category.

Farmland of Statewide Importance:

15.8 acres or 3% of the study area is in the Farmland of Statewide Importance Category. This Category is found primarily in the northern and southern portions of the study area. No portion of the subject property falls within this Category.

The first two Important Farmlands Categories are clearly the most suitable for agriculture. However, neither of these Categories is found within the study area. Unique Farmlands, making up 58% of the subject property, are found because part of the land is presently used for agriculture. 42% of the subject property is classified as Farmland of Local Importance. The only Agricultural Category which is situated below the categories found within the study area is the Grazing Land Category. Thus, in accordance with the rating of the soils types in Section H above, the suitability of the subject area for agriculture would fall in the medium range at best. Finally, none of the soils in the study area are rated as prime agricultural soils.

I. Candidate Listing for Prime Soils

None of the soils found in the study area are within the Candidate listing for Prime Soils.

J. Micro Climate:

Information for Micro Climates in San Diego County is contained in the Climates of San Diego County Agricultural Relationships, published by the University of California Agricultural Extension Service. At the time of the publication of this document, the nearest Weather Reporting Station to the Subject Property was in Vista. This station is located approximately 4.78 miles to the west of the subject property.

The Vista Weather Station indicates a mean maximum temperature of 74°, a mean minimum temperature of 50.4° with a mean annual temperature of 62.2°, and extreme highs of 107° and extreme lows of 27°. Rainfall at the Vista Station averages 16.52" with 8.61" coming during the months of January, February, and March. The estimated date of the first freeze is January 1st, and the estimated date of the last freeze is February 1st.

Thus the mildness of the microclimate of this area would be advantageous to the growing of semi-tropical crops.

K. Facilities:

Imported Water is available from the Rainbow Municipal Water District.

L. San Diego County Avocado Production:

The County of San Diego County Department of Agriculture, Weights and Measures produces an annual report regarding Crop Statistics for San Diego County. The 2002 report is their most current report. According to this report, there are currently 25,729 acres planted with avocados in San Diego County. Additionally, there are 8,934 acres planted in nursery and flower crops, however there will be no direct impacts

This proposal will directly impact .012% of the County's avocado plantings and none of the County's nursery and flower plantings. Thus this reduction in production represents only a minute portion of the avocado and nursery and flower production in San Diego County, and thus will not result in any substantial decrease in terms of total County production.

M. Sustainability of Agriculture on Smaller Parcels in San Diego County:

Figure 13 is a memorandum from the Department of Agriculture, Weights & Measures to the Department of Planning and Land Use dated June 2, 1997. This memo addresses the issue of the viability of commercial

agriculture on 2-acre parcels and specifically addresses citrus. Recent discussions with the sending Department indicate that the statements made in the memorandum are still valid today. Some of the statements made in this memorandum pertinent to this issue are as follows. All of the figures quoted are as of June 2, 1997.

- There are currently 671 citrus farms of two or fewer acres in San Diego County.
- There are citrus farms as small as .1 acres.
- There are 4,298 small farms in San Diego County which are less than 9 acres.
- The average farm size in San Diego County has been falling and is currently only 21% of the average farm size statewide.
- In San Diego County only 36% of the farmers list farming as their primary occupation, versus 52% statewide and 54% nationwide.
- The cost of land in San Diego County makes it prohibitive for many new farmers to begin an operation on a large parcel, so the ability to farm small parcels is crucial to the success of future agriculture in San Diego County.

Additionally, Figure 14 is a table representing the costs of producing avocados on this property versus yield and profit. The water quantity estimates were obtained from Dr. Eric Bender of the University of California Cooperative Extension, while the water costs were obtained from the Rainbow Municipal Water District. Current avocado pricing was obtained from the Avocado Hotline in Fallbrook as of January 7, 2005. The pricing was set at $.90/pound, which was an average of the range in market prices between $.60 and $1.20 per pound. Other costs of production were obtained from the University of California Cooperative Extension Publication entitled Avocado Sample Establishment and Production Costs and Profitability Analysis for San Diego and Riverside Counties. Costs did not include land costs or property taxes in that the avocado production on the properties would be a secondary use to the residential use on these properties. Finally, the yield per acre of 7250 pounds per acre was also taken from this publication as the average yield for avocado production in San Diego County.

As can be seen from Figure 14, a purchaser of one of these parcels can expect to yield a net profit of $1628 per acre per year by continuing to produce avocadoes. It is the conclusion of this analysis that not only would continued avocado production on the proposed parcels be feasible on the proposed properties, but there would be a strong economic incentive for future owners to continue the avocado production.

Thus not only is agriculture proven to be viable on smaller parcels in San Diego County, but, due to the cost of land, is likely to be critical to the continued success of agriculture in San Diego County. The creation of parcels planned in the proposed development may play a small part in enhancing the future of agriculture in this County.

N. History of Smaller Parcels in this Portion of Bonsall:

Figure 15 was prepared to examine the relationship between smaller parcels in this vicinity of Bonsall. This Figure shows parcels under 4 acres which are currently in agricultural use. The result was that 71 Parcels in the area shown on Figure 15 above the bold line are shown as having an agricultural use and are under 4 acres in size.

Thus, not only is agriculture viable on smaller parcels in San Diego County in general, but the same appears to be true for this portion of Bonsall. Accordingly the creation of smaller parcels on the subject property will not have an adverse impact to agriculture, and may even enhance the possibility of agriculture remaining on this property.

O. Pesticides

Pesticide users are required to register with the County and keep pesticides confined to the property on which they are being used with no significant drift. The drift of pesticides can be harmful for adjacent agricultural uses as well as residential uses. Pesticides which drift onto adjacent crops can then show up in the fruit of that crop. If the adjacent owner has not registered for using that pesticide, that owner could be cited for a pesticide violation and the crop lost. Additionally the drift could bring a pesticide in contact with a plant that could be harmed by the pesticide.

Thus it is important that a pesticide user confines the substance to his property and uses them responsibly, whether it is used for agriculture or residences.

Thus the subject property will not result in a conflict between pesticide use and future residents.

Pesticide users are now required to confine their pesticides to their property and not produce any significant drift. The small number of parcels proposed and the fact that the new owners are likely to maintain agriculture, all contribute to this project not resulting in any conflicts with the adjacent agricultural uses. Additionally all buyer are required to be notified in writing and to acknowledge by signature that there may be agricultural uses nearby that may expose the buyer to irritations and inconvenience. (See "O" below.)

P. Property Disclosure Ordinance:

The San Diego County Board of Supervisors, on February 12, 2003, amended the San Diego County Code of Regulatory Ordinances to require purchasers to be notified in writing that agricultural uses may exist near to property that the buyer is purchasing. The buyer must acknowledge by signature that such agricultural uses are likely to be nearby that may expose the buyer to certain irritations and inconveniences.

Thus anyone purchasing a parcel of this development must be notified of the near agricultural uses and the potential for irritations and inconveniences.

III. CUMULATIVE IMPACT

Section 15130(a) of the State CEQA Guidelines states that cumulative impacts of a project should be discussed when the project impacts, even though individually limited, are cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The following questions are listed in the CEQA Guidelines, Appendix G and are to be considered in evaluating cumulative agricultural impacts. The first three questions have been previously addressed in this report, while the last question will be addressed in detail in this Section.

1. Would the project convert prime farmland, unique farmland, or farmland of statewide importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California resources Agency, to nonagricultural use?

None of the areas being directly impacted are classified as Prime Farmland or Farmland of Statewide Importance. 19.37 acres of Unique Farmland is found on the subject property with 3.04 acres being impacted.

The area of this development contains only a minor amount of area classified as Farmland of Statewide Importance and will have only a small amount of area impacted.

There are no Prime Farmland Soils, no soil rated high in fertility or high suitability for crops grown in the area, no Prime Farmlands being converted, and only a small amount of Unique Farmland will be impacted. Thus the conversion of agricultural uses is not considered significant.

2. Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

There are no Williamson Act Contracts in the vicinity. There is an agricultural use regulation on the subject property, as well as the surrounding property. However, this use regulation is not an exclusive agriculture zone, and permits a variety of uses. There is no use proposed for the project that would not be permitted in the agricultural zones surrounding it.

Thus the determination is the project will not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

3. *Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use?*

The conclusion of this analysis is that changes in the existing environment, which, due to their location or nature, will not result in the conversion of farmland to nonagricultural use.

This conclusion is based upon the following points.

a. The amount of agricultural area to be directly impacted by pads, cuts, and fills, and roads and driveways totals approximately 3.04 acres or 23% of the 13.27 acres of agricultural area currently existing. Thus 10.23 acres or 77% of the current agriculture land on the subject property will remain available for agriculture. At present, 20.6% of the surrounding area is in agriculture. Since there is still significant agricultural activity occurring on the subject property, the likelihood of conflicts between the subject property and the agricultural operations on the surrounding area will be minimized.

b. The San Diego County Board of Supervisors, on February 12, 2003, amended the San Diego County Code of Regulatory Ordinances to require purchasers to be notified in writing that agricultural uses may exist nearby on property that the buyer is purchasing. The buyer must acknowledge by signature that such agricultural uses are likely to be nearby that may expose the buyer to certain irritations and inconveniences.

c. Impacts to agriculture in the surrounding area will also be limited because 77% of the agriculture is likely to remain, the parcels proposed are not unusual in size in the surrounding area. The conclusion of this analysis is that changes in the existing environment, which, due to their location or nature, will not result in the conversion of farmland to nonagricultural use.

4. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

As a part of the agricultural analysis, a study was done to determine if this project, combined with other projects in the vicinity, would have an impact that is cumulatively considerable. This was determined by reviewing projects which have been recently approved or are contemplated to be approved in the near future, and adding the results to the impacts of the subject property.

A. Methodology:

An area was chosen which would function as a cumulative study area. The boundaries of this area were established by reviewing features of the landscape, which may isolate agricultural in this vicinity from other agricultural areas in the county. These landscape features were primarily major areas of steep slope that would separate agricultural areas, major areas where no agricultural activity was taking place, and areas that had had substantial urban development.

The cumulative study area was superimposed on the San Diego County GIS Discretionary Permit Map. This map indicates Major and Minor Subdivisions, Major Use Permits, General Plan Amendments (GPA's), and Plan Amendment Authorizations (PAA's) both requested and approved since approximately January of 1999. Major Use Permits for cellular antenna sites were not included due to the very small area that is effected with these projects.) This results in a gross number of projects of any type in the study area. In this way the selected projects could be identified that had been approved and were contemplated over the last 5.5 years.

A map of the cumulative study area was overlain with the County Vegetation Map to determine which of the selected projects identified in the study area were ones which occurred on lands used for agriculture. To make this determination, any project occurring on vegetation classified as agriculture or developed and disturbed land was considered. Disturbed and developed land was considered because the land may have originally been in agriculture, with the developed classification being a result of the selected projects. Since the GIS Map only used points to identify projects, any selected projects even remotely close to agriculture or urban vegetation types was considered.

The next step was to identify those previous and contemplated projects that are occurring on land currently used for agriculture that have or would have an effect on principal farmlands within the cumulative study area. (For purposes of this study, the term principal farmlands" are those land referenced in question one of the CEQA Guidelines, reproduced on the first page of this Section. These lands would include Prime Agricultural Lands, Agricultural Lands of Statewide Importance, and Unique

Farmlands per the California Department Important Farmlands Map 2002). This was done by overlaying the cumulative study area with the appropriate portions of the important farmlands map. Projects not within a principal farmland were also eliminated from consideration. As above, the GIS Map only used points to identify projects, and selected projects even remotely close to principal farmlands was considered.

The plot plans and maps for those projects meeting both of the above tests were then obtained from the County Project Processing Center (For purposes of this study, this last grouping of projects will be termed "Selected Projects"). The maps were then superimposed on the vegetation and farmlands maps to determine the principal farmlands in agriculture that were affected. The effects to the subject property could then be added to the approved and proposed agriculture lands affected through selected projects. This could be compared with the land in agriculture for the County as a whole. In this way a determination could be made if the cumulative impact of the selected projects in the cumulative study area was having a considerable cumulative impact to agriculture in San Diego County as a whole.

The data within this report was based upon the County GIS Discretionary Permit Map dated August 2004. It is understood that prior to the public hearing, the discretionary permits will be reviewed in light of updated maps. At that point, it will then be decided if there are changes which warrant disclosure to the decision making body.

B. The Cumulative Analysis:

The subject property is located in the northeastern part of the Bonsall Planning Area. A potential cumulative impact area was established which is some 5439 acres in size and is shown on Figure 16. The boundaries of this area were established by the topography related to the San Luis Rey River to the north, the Moosa Canyon Creek to the south and southwest, and Interstate 15 to the east.

After reviewing selected projects which met the criteria described under "Methodology" it was determined that the subject property and 8 additional selected projects were occurring on lands that were being used for agriculture and were on a principal farmland as previously defined. Appendix A has a listing of the original group of selected projects and the 8 which met the established criteria (not including the subject property).

The projects, 7 subdivisions and 1 major use permit affect 180.1 acres of principal farmlands. When added to the 3.04 acres affected by the

subject property, there is a total effect of 183.14 acres in the cumulative study area.

Figure 17 indicates the location of the other selected projects within the cumulative study area.

C. Agriculture in San Diego County:

According to the Department of Conservation, the following acreages of principal farmlands in San Diego County existed as of 2002:

Prime Farmland	10,019
Farmland of Statewide Importance	13,000
Unique Farmland	57,000
Total	80,019

This represents a reduction of 493 acres or .6% in principal farmlands between 2000 and 2002. However, the 2002 Crop Statistics and Annual Report of the County of San Diego Department of Weights & Measures (the latest statistics available) indicate that within the period from 2001 to 2002 there was an increase of 20,662 acres or 9% of land in agricultural lands. Thus while there was a minute decrease in the principal farmlands, the County is experiencing a substantial increase in overall agricultural acreage.

D. Cumulative Effects within the Cumulative Study Area

1. Characteristics of the cumulative study area.

The cumulative study area is in the northeastern part of the Bonsall Planning Area and occupying about 25% of that Planning Area. The County General Plan shows regional categories of Estate Development (EDA) over a large majority of the area, but also includes a small part of the Bonsall Country Town. The General Plan Designation for this area is primarily (19) Intensive Agriculture with significant areas of (17) Estate along the southern boundary and a large area of (21) Specific Plan Area to the north. There are also areas of (18) Multiple Rural Use in some of the steeper area in the far northeast.

Zoning in this area is primarily light agricultural with a minimum parcel size generally of 2 acres, although there are areas of 1, 4, 8, and 10 acres. Along the flood plain of the San Luis Rey River, minimum parcel sizes are 20 acres.

About 50% of the cumulative study area is used for agriculture, or roughly 2700 acres. There are also large areas within the flood plain of the San Luis Rey River which area vacant. To the south and also to the west are areas of development exceeding, in some cases, one dwelling unit per acre. The remainder of the area is either vacant or has estate homes on large lots. Agriculture in this area is primarily avocados, with some remaining citrus and also small areas of intensive truck farming and nursery stock.

The impact of avocados coming into the United States from Chile and Mexico on a year round basis has not been fully assessed. However, the California Avocado Commission anticipates that the price per pound of California Avocados will drop a small amount during the present reporting year (November 04 to November 05). This could result in the continued maintenance of existing groves, but limited new plantings. The prices for citrus products have dropped in recent years to the point where many of the citrus groves have a negative cash flow and are being removed or no longer maintained. There are virtually no new plantings of citrus on a large scale.

Climate in this region is similar to the rest of Coastal San Diego County with slightly more rainfall. Its mild nature is the primary reason for the agriculture that exists in the cumulative study area.

About half of the soils in the cumulative study area are classified as "unique farmland" by the California Department of Conservation because of the existing agriculture. There are also areas of prime farmland and farmland of statewide importance located within the flood plain of the San Luis Rey River and along Lilac Road in the western part of the cumulative study area. The remainder of the soils are classified as "other", which are developed or not useful for agriculture. Generally the quality of soils in this area vary from non-arable to good, with the better soils found in the flood plain. As indicated in the previous paragraph, climate plays a more important role in the agricultural development of this area than the soils.

Water is currently provided through groundwater or by the Rainbow Municipal Water District and water is available for agriculture.

In summary, about 50% of the cumulative study area is in some sort of agriculture and both the zoning and the current general plan reflect this use. Soils are limited in most of the area and the pricing trends for citrus and to some extent avocados place a cloud over the future agricultural use of this area.

2. Effect of the subject property on the cumulative study area.

The result of the development of the subject property will be to create lots sizes similar to or larger than most of the planning and the zoning in the cumulative study area require. Additionally, the agricultural orientation of the area will be maintained, with the development of the subject project having no negative effects on the remainder of the area.

The parcels proposed for the subject property average 6 acres. This is more than adequate to provide for continuing agriculture on the parcels, as indicated by the cost analysis within this report. Additionally, as also shown in this report, there are a large number of parcels under 4 acres within the vicinity of the subject property which continue to be used for agriculture. Thus there is a high probability that most of the agriculture use on the subject property itself will continue, and as such, should not affect ongoing agricultural operations in the cumulative study area.

The main determinant of the future of agriculture in the cumulative study area will be the competition from Latin American fruit. In this case the home sites being established by the subject project will have an advantage over the larger commercial operations, because the groves will have an aesthetic value and also will not have to amortize the cost of the land, whose primary use is a home site. Therefore the avocados on the proposed lots, as with the other parcels in Bonsall where the grove is a part of a home site, will likely continue beyond the time that the commercial groves are no longer maintained.

Finally, there will be 3.04 acres of agriculture impacted compared to approximately 2720 acres of existing agriculture. Therefore this project will impact .001% of this agriculture and will have a negligible effect on agriculture within the cumulative study area.

E. Conclusions

In terms of a cumulative effect to the cumulative study area, the subject property will have minimal effects. The parcels are sized so they are consistent with the development as planned by the General Plan and zoning. They are also consistent with other lots in the cumulative study area which are currently supporting agriculture. Additionally, in the face of foreign competition, the smaller parcels may even have an advantage over large commercial operations.

In terms of cumulative effect to San Diego County, the subject property affects 3.04 acres of the principal farmlands or .003% of all of these acres. Adding the eight additional selected project meeting the parameters of this study amounts to a cumulative total of 183.14 acres. This amounts to a total of .23% of the Principal Farmlands in San Diego County.

Considering this small amount with the fact that the overall agricultural acreage in San Diego County increased 20, 662 acres from 2001 to 2002 there is clearly not a cumulatively considerable impact to agricultural resources to San Diego County as a result of the approval of the subject project.

IV. ANALYSIS OF IMPACTS

It has been determined that due to the characteristics of the subject property as well as the surrounding area, there will not be a significant impact to agricultural resources as a result of the implementation of this project. This is based upon an assessment of the threshold standards established in Section I, recommended mitigation, as well as other points as described below.

Thresholds of Significance:

1. The project will result in the conversion of:

    a. Prime agricultural soils (i.e. an LLC rating I-II or soils rated as good in terms of fertility and suitability for the predominant crop in the vicinity).

    None of the soils on the subject property are rated as prime agricultural soils. None are rated as good in terms of suitability for avocados or citrus. 37% of the soils are rated as non-arable. In terms of fertility, none of the soils are rated as high.

    In terms of suitability for predominant crops in the vicinity, the predominant crop would be avocados, and the soils on the subject property are rated as fair for avocados.

    b. Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

    None of the areas being directly impacted are classified as Prime Farmland or Farmland of Statewide Importance. 19.37 acres of Unique Farmland is found on the subject property with 3.04 acres being impacted.

    The area of this development contains only a minor amount of area classified as Farmland of Statewide Importance and will have only a small amount of area impacted.

    There are no Prime Farmland Soils, no soil rated high in fertility or high suitability for crops grown in the area, no Prime Farmlands being converted, and only a small amount of Unique Farmland will be impacted. Thus the conversion of agricultural uses is not considered significant.

2. The Project will establish parcel sizes that cannot support future agricultural operations and are not consistent with other parcel sizes in the vicinity that currently support agriculture.

The project proposes an average lot size of 6 acres, with a minimum parcel size of 4.2 acres. It has been stated by the San Diego County Department of Agriculture, Weights, and Measures that there are over 600 citrus farms in San Diego County under 2 acres in size and over 4,000 small farms under 9 acres. They further state that the average size farm is falling and that only 36% of the County farmers list farming as their primary occupation. Finally they state that the cost of land in this County makes it prohibitive to begin an agricultural operation on a large parcel and that the ability to farm small parcels is crucial to the success of future agriculture in San Diego County.

Additionally a review of a map showing parcels and vegetation clearly shows that agriculture is successful on smaller parcels in this area.

Thus, not only is agriculture viable on smaller parcels in San Diego County in general, but the same appears to be true for this portion of Bonsall.

Additionally, an analysis of the cost versus revenue for maintaining agriculture on these properties indicates that profit on these parcels could be in the neighborhood of $1620 per acre. Thus not only would continued avocado production on the proposed parcels be feasible on the proposed properties, but there would be a strong economic incentive for future owners to continue the avocado production.

Accordingly the creation of smaller parcels on the subject property will not have an adverse impact to agriculture, and may even enhance the possibility of agriculture remaining on this property, both by a determination by the County Department of Agriculture, Weights, and Measures and a review of parcels in the vicinity under 4 acres which support agriculture. Additionally, this residual agriculture is likely to remain, since the owners of the smaller parcels are likely to place a value on the aesthetics of the groves as well as an economic value, and there will be more incentive to keep the agriculture than now exists.

Thus the determination is that this threshold has not been exceeded and the project will not result in significant impacts in terms of supporting agriculture.

3. The project will result in a conflict in the study area with agricultural zoning or use regulations.

There is an agricultural use regulation on the subject property as well the surrounding property. However, this use regulation is not an exclusive agriculture zone, and permits a variety of other uses. There is no use proposed for the project that would not be permitted in the agricultural zones surrounding it. Thus the determination is that this threshold has not been exceeded and the project will not result in significant impacts in terms of conflicts with agricultural zoning.

4. The project will result in a conflict in the study area with a County Agricultural Preserve.

   None of the study area, including the subject property is within a County Agricultural Preserve. Thus there will be no conflict with the Agricultural Preserve and this threshold has not been exceeded.

5. The project will result in a conflict in the study area with a land conservation contract.

   There is no property within the study area that lies within a Land Conservation Contract. Thus this threshold has not been exceeded.

6. The density proposed by the project will have an adverse significant impact on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.

   The amount of agricultural area to be directly impacted by pads, cuts and fills, and roads and driveways totals approximately 3.04 acres or 23 % of the 13.27 acres of agriculture currently existing. Thus 10.23 acres or 77% of the agriculture on the subject property will remain. In terms of the entire subject property, 34% of the subject property will be in agriculture after the proposed development. At present, 22% of the surrounding area is in agriculture. Thus after the proposed development there still will be a higher percentage of the subject property used for agriculture than in the surrounding area.

   As stated in the previous section, it has been indicated by the San Diego County Department of Agriculture and Weights and Measures that there are over 600 citrus farms in San Diego County under 2 acres in size, and over 4,000 small farms under 9 acres. They further state that the average size farm is falling and that only 36% of the County farmers list farming as their primary occupation. Finally they state that the cost of land in this County makes it prohibitive to begin an operation on a large parcel and

that the ability to farm small parcels is crucial to the success of future agriculture in San Diego County.

Additionally, a review of this area in Bonsall indicates that agriculture is remaining on smaller parcels, and that much of the agriculture in the area occurs on smaller parcels. Also, since the owners of the smaller parcels are likely to place a value on the aesthetics of the groves as well as an economic value, there will be more incentive in keeping the agriculture than now exists.

Finally, an analysis of the cost versus revenue for maintaining agriculture on these properties indicates that profit on these parcels could be in the neighborhood of $1628.00 per acre. Thus not only would continued avocado production on the proposed parcels be feasible on the proposed properties, but there would be a strong economic incentive for future owners to continue the avocado production.

To assist in the continuation of the agricultural use, the existing irrigation system will be left in tact except for alterations needed to operate the system on individual parcels, with connections to imported water.

It then follows that if there is still significant agricultural activity occurring on the subject property, the likelihood of conflicts between the subject property and the agricultural operations on the surrounding area will be minimized.

In addition, the proposed parcels of the subject property are similar in size to 78% of the parcels that now exist in the study area. Thus parcels in the size range of the parcels proposed by this project are the norm in this area.

Finally, The San Diego County Board of Supervisors, on February 12, 2003, amended the San Diego County Code of Regulatory Ordinances to require purchasers to be notified in writing that agricultural uses may exist nearby property that the buyer is purchasing. The buyer must acknowledge by signature that such agricultural uses are likely to be nearby that may expose the buyer to certain irritations and inconveniences.

Thus the determination is that this threshold has not been exceeded and the project will not result in significant impacts in terms of adjacent agricultural uses.

7. A significant proportion of the existing agriculture on the subject property will be directly impacted through building pads, roads, or driveways.

The amount of agricultural area to be directly impacted by pads, cut and fills, and roads and driveways totals approximately 3.04 acres. There is presently 13.27 acres devoted to agriculture and this will result in a 22 % loss of the agriculture now existing on the subject property, with 77% of the agriculture not directly impacted by the development. Thus the determination is that this threshold has not been exceeded and the project will not result in significant impacts in terms of direct agricultural impacts.

8. This project, in conjunction with other existing and proposed projects, would have an impact to agriculture that is cumulative considerable pursuant to the State CEQA Guidelines.

In terms of a cumulative effect to the cumulative study area, the subject property will have minimal effects. The parcels are sized so they are consistent with the development as planned by the General Plan and zoning. They are also consistent with other lots in the cumulative study area which are currently supporting agriculture. Additionally, in the face of foreign competition, the smaller parcels may even have an advantage over large commercial operations.

In terms of cumulative effect to San Diego County, the subject property affects 3.04 acres of the principal farmlands or .003% of all of these acres. Adding the eight additional selected project meeting the parameters of this study amounts to a cumulative total of 183.14 acres. This amounts to a total of .23% of the Principal Farmlands in San Diego County.

Considering this small amount with the fact that the overall agricultural acreage in San Diego County increased 20, 662 acres from 2001 to 2002, there is clearly not a cumulatively considerable impact to agricultural resources to San Diego County or within the cumulative study area as a result of the approval of the subject project.

A. Impacts to the subject property:

Additional points supporting the conclusion that there will not be significant impacts to agricultural resources on the subject property as a result of this development are as follows.

1. The subject property has few advantages for the use of agriculture other than the microclimate.

The purpose of this analysis is to assess the impacts to agricultural resources from the approval of proposed project. This implies an evaluation of the agricultural resource in determining this impact. The subject property has few advantages for agricultural uses, which must be a consideration in establishing the threshold for significant impacts.

None of the soils on the subject property are rated as prime agricultural soils, and 37% are rated as not arable. The arable soil is rated as fair for avocados and citrus and low to medium in terms of fertility.

18.37 acres or 58% of the subject property is categorized as Unique Farmland. The remainder is categorized as Farmland of Local Importance. Unique Farmland is simply land which does not qualify as Prime Farmland or Farmland of Statewide Importance, but has a history of cultivation and is usually irrigated. Thus to qualify as Unique Farmland it is only necessary that there be a history of cultivation.

2. Only a limited amount of the agriculture on the property will be directly impacted and the remaining agriculture will be at a higher ratio than the surrounding property.

   The amount of agricultural area to be directly impacted by pads, cut and fill, and roads and driveways totals approximately 3.04 acres. There is presently 13.27 acres devoted to agriculture and this will result in a 22% loss of the agriculture now existing on the subject property. After the proposed project, 34% of the property will be devoted to agriculture. This is a much higher proportion of agricultural use than the surrounding area which has 20.6% of its area in agriculture. Since the proportion of land devoted to agriculture on the subject property after development will be the same as that of the surrounding area, such development will not result in a stimulus to the significant conversion of other agricultural lands or as a deterrent to the continuation of agriculture in this area.

   To assist in the continuation of agriculture, the existing irrigation system will be left in tact except for alterations needed to operate the system on individual parcels, with connections to the imported water.

   Thus 77% of the agriculture now existing on the subject property will not be directly impacted by the development.

3. The average size of the parcels being proposed is capable of sustaining agriculture and may enhance the future of agriculture on this property.

It has been stated by the San Diego County Department of Agriculture and Weights and Measures that there are over 600 citrus farms in San Diego County under 2 acres in size and over 4,000 small farms under 9 acres. They further state that the average size farm is falling and that only 36% of the County farmers list farming as their primary occupation. Finally they state that the cost of land in this County makes it prohibitive to begin an operation on a large parcel and that the ability to farm small parcels is crucial to the success of future agriculture in San Diego County.

An analysis of the cost versus revenue for maintaining agriculture on these properties indicates that profit on these parcels could be in the neighborhood of $1620.00 per acre. Thus not only would continued avocado production on the proposed parcels be feasible on the proposed properties, but there would be a strong economic incentive for future owners to continue the avocado production.

Figure 15 was prepared to examine the relationship between smaller parcels in this vicinity of Bonsall. This Figure shows parcels under 4 acres which currently have an agricultural use. The result was that 71 Parcels in the area shown on Figure 15 above the bold line are shown as having an agricultural use and are under 4 acres in size. Additionally, the above referenced parcels have an average size of 6 acres.

The smaller parcels being created may enhance the retention of agriculture because the groves will have an aesthetic value as well as a purely economic value and are likely to be maintained, even if they are no longer profitable.

4. Impacts to San Diego County as a whole:

The conclusion of this analysis is that there will be no significant impacts to agricultural resources in terms of San Diego County as a whole as a result of this development. This proposal will directly impact .012% of the County's avocado plantings, and none of the nursery and flowers. Thus this reduction in production represents only a very small portion of the avocado and citrus production in San Diego County, and will not result in any substantial impact to San Diego County agriculture as a whole.

V. FIGURES

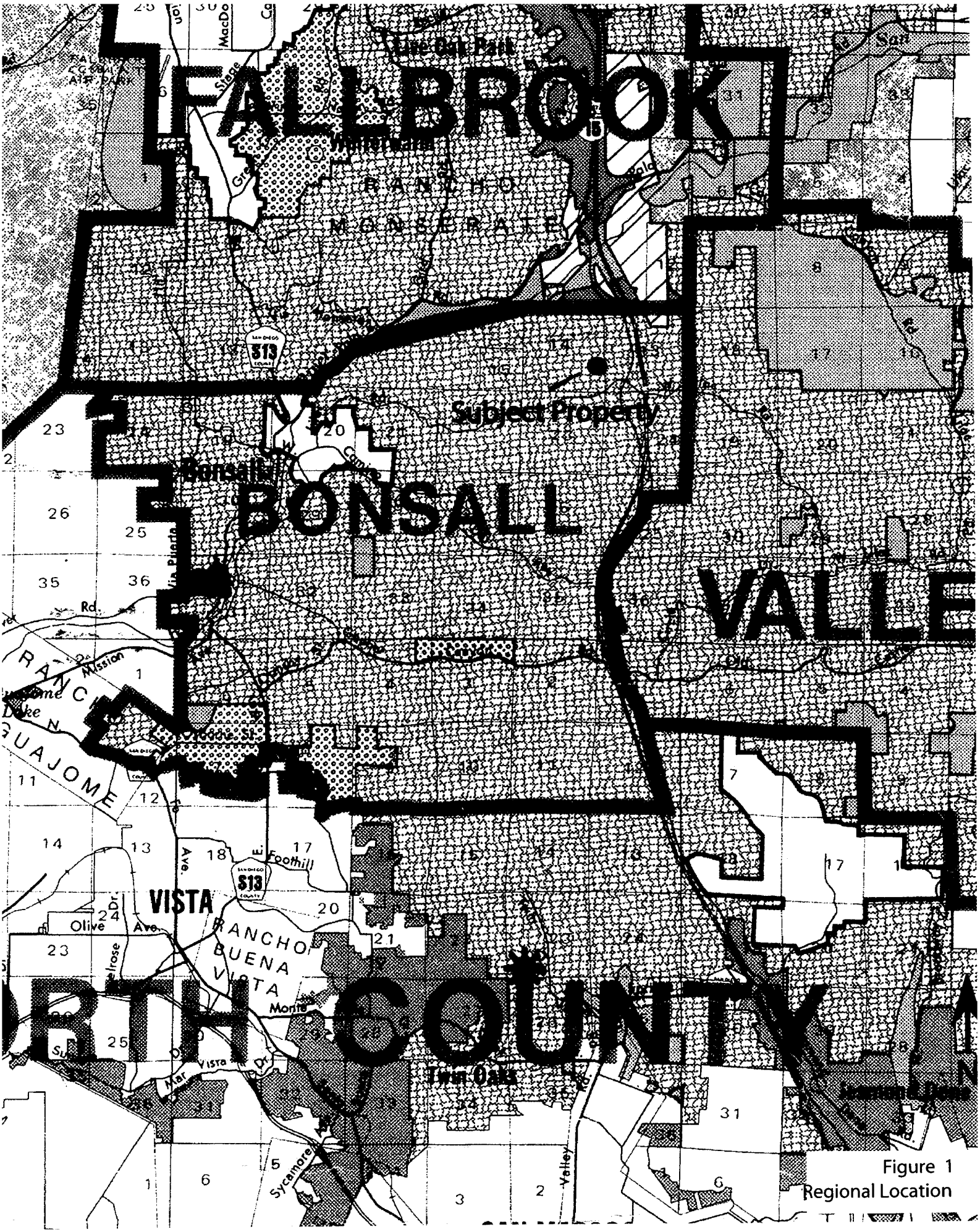

Figure 1
Regional Location

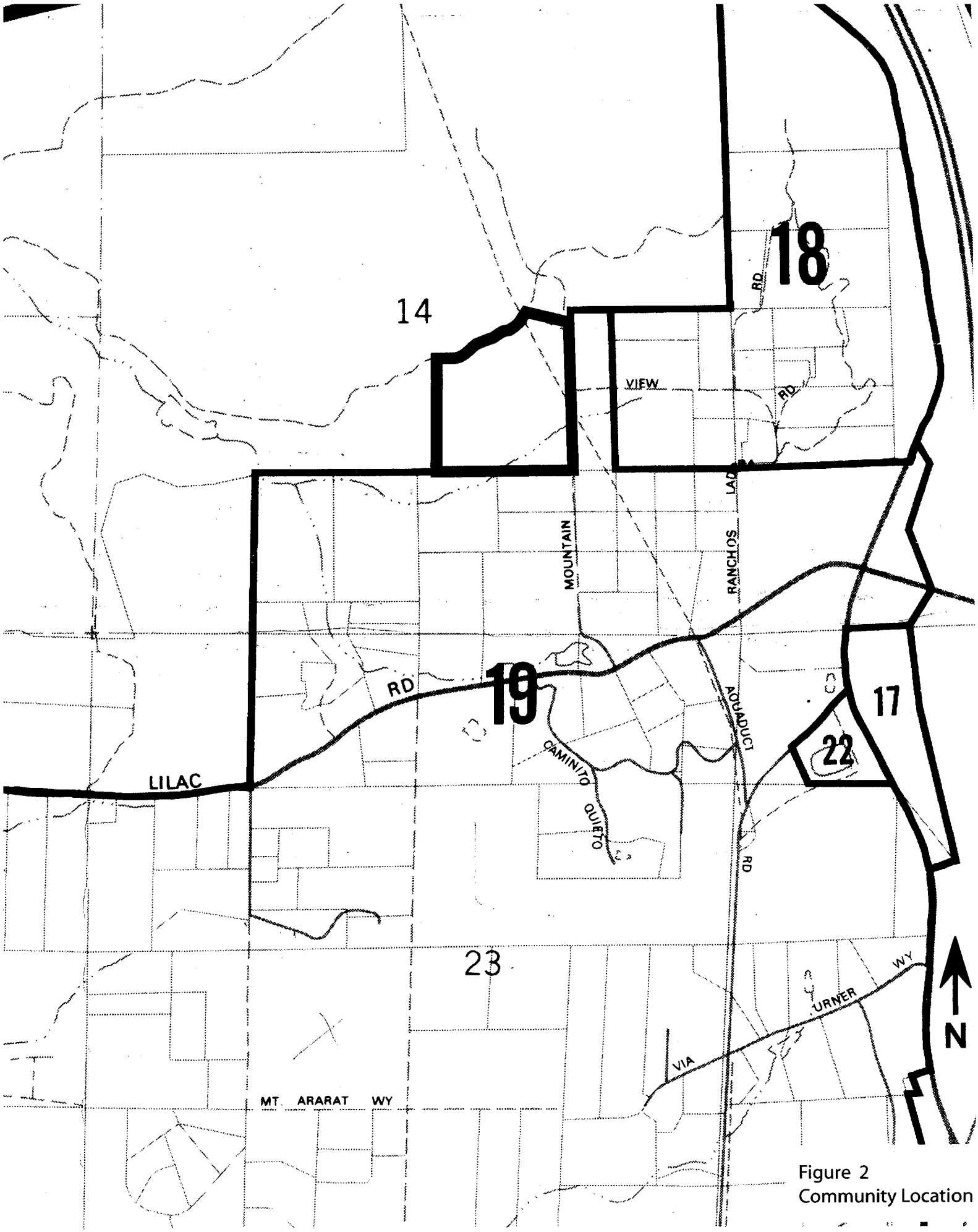

Figure 2
Community Location

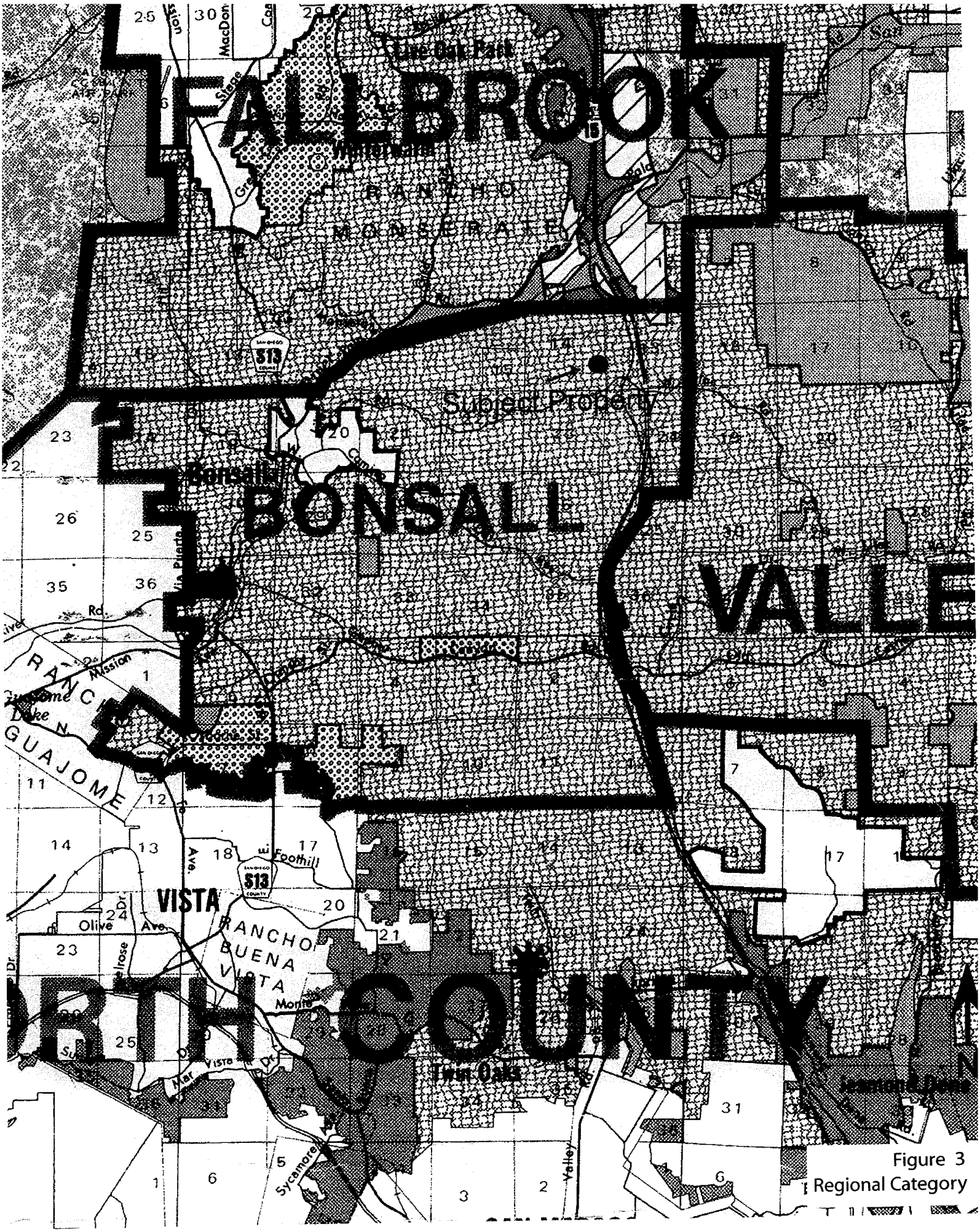

Figure 3
Regional Category

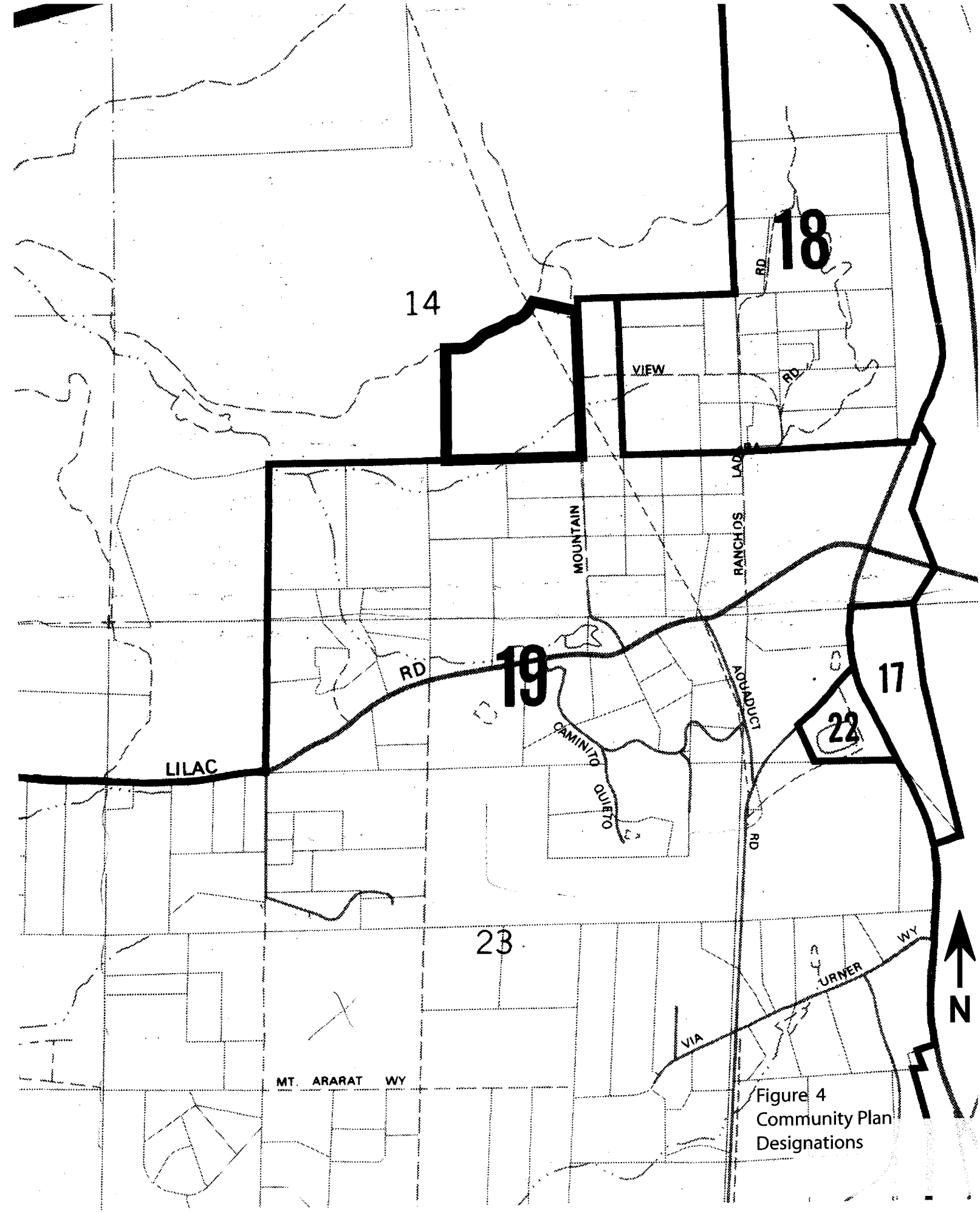

Figure 4
Community Plan
Designations

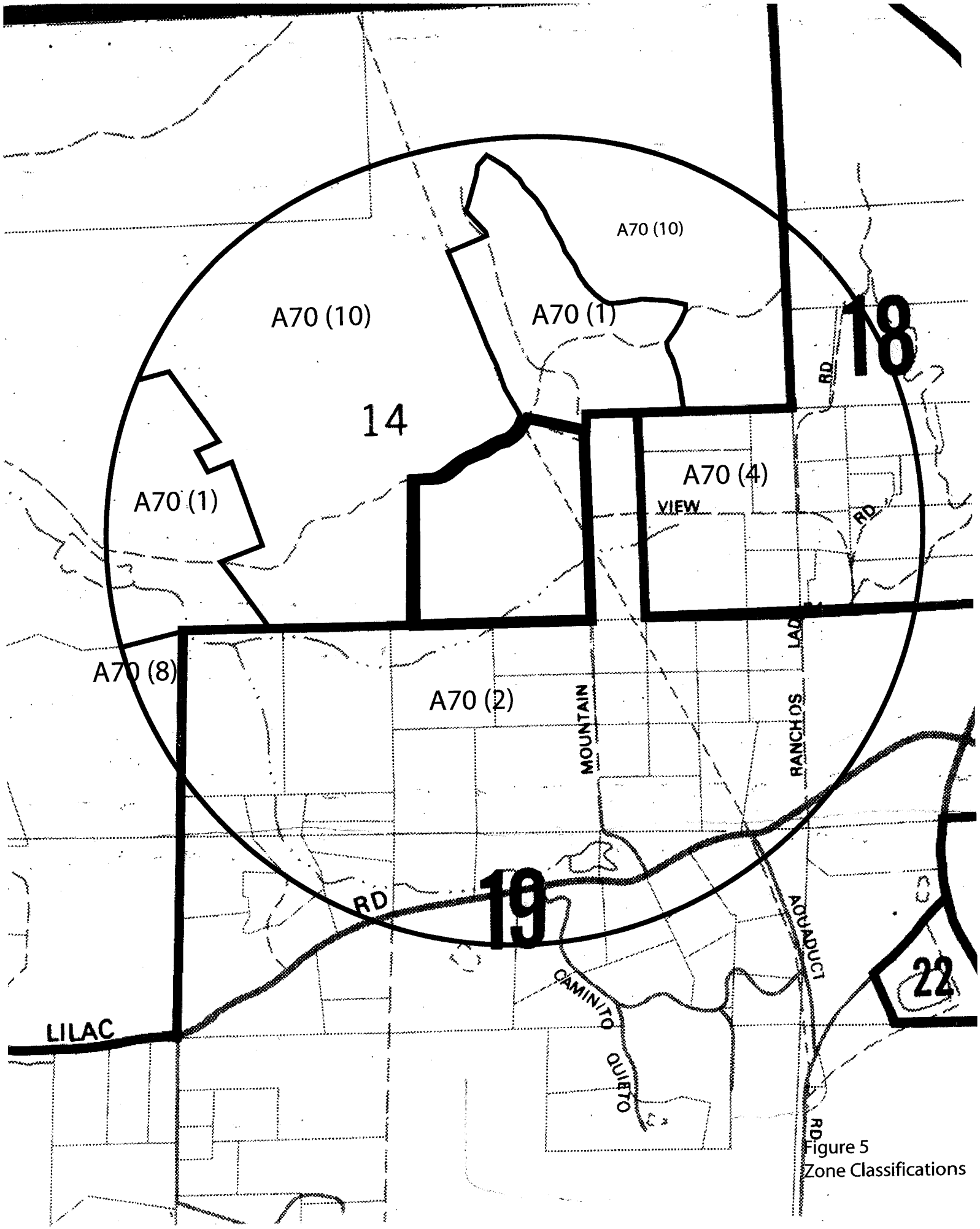

Figure 5
Zone Classifications

PARCEL SIZE TABLE

Acreage Classification	Number of Parcels	Percentage
Less Than 1 Acre	1	1%
1-2 Acres	3	4%
2-4 Acres	28	40%
4-8 Acres	23	33%
8-20 Acres	9	13%
20 + Acres	6	9%
TOTAL	70	100%

Figure 7
Parcel Size Table

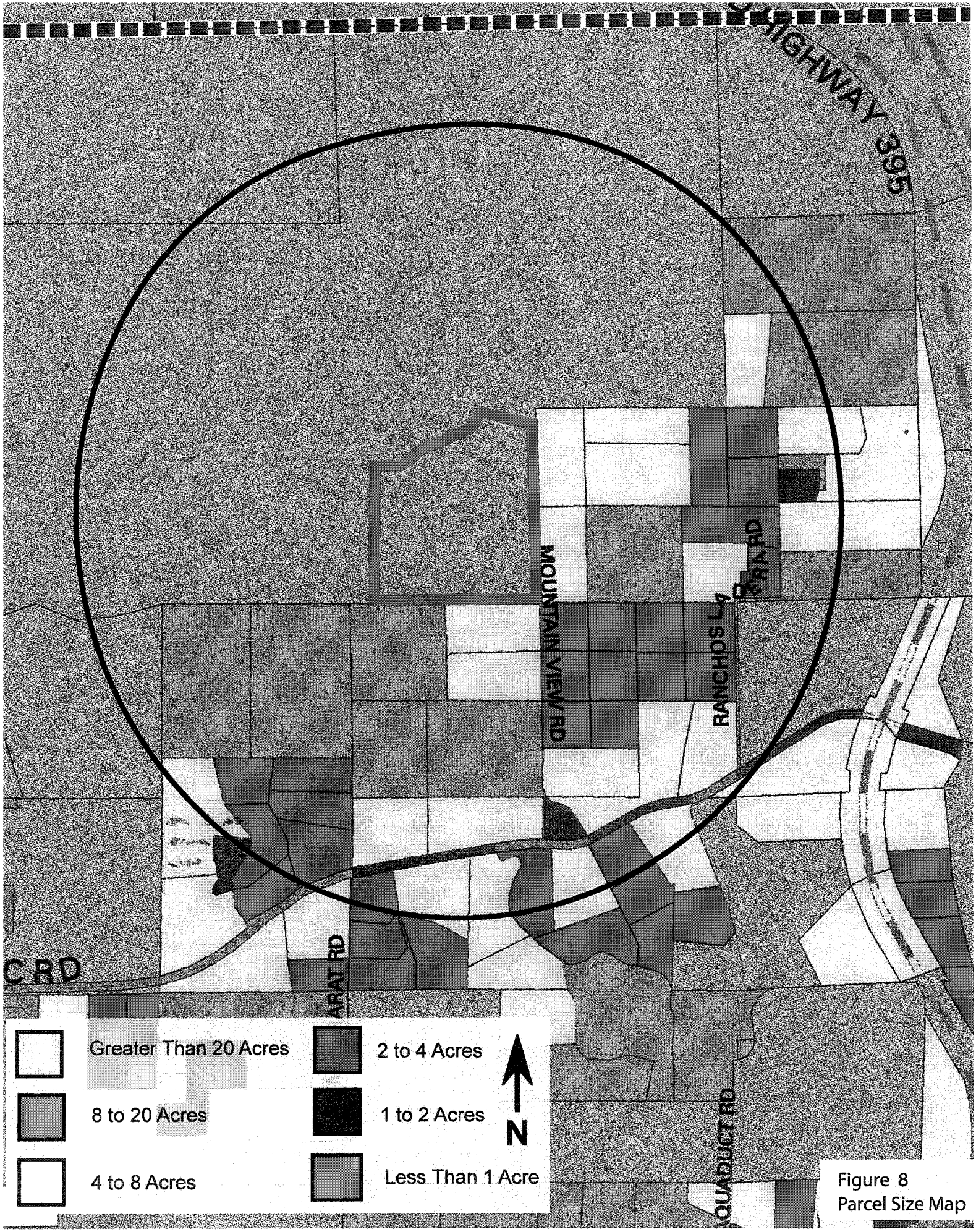

Figure 8
Parcel Size Map

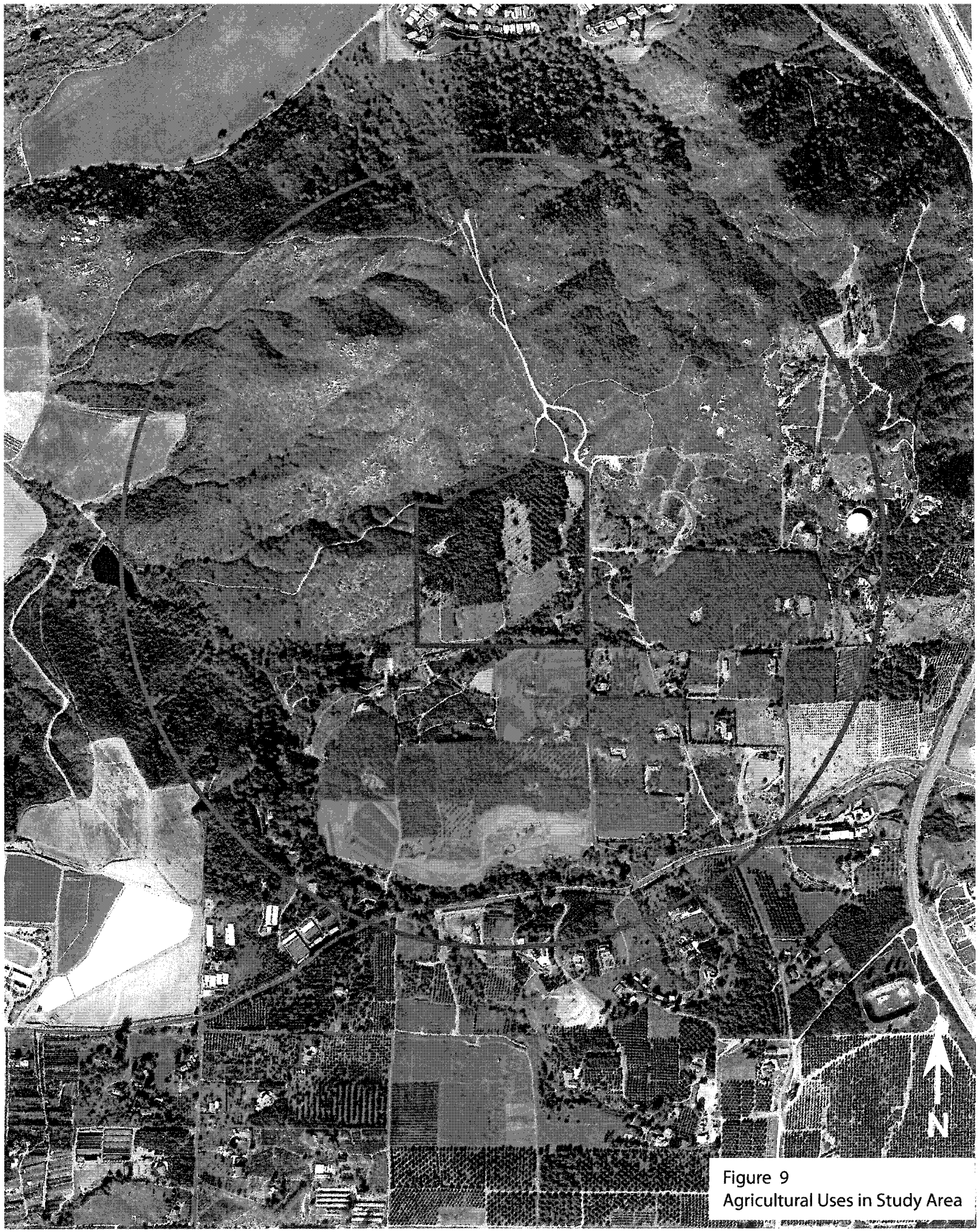

Figure 9
Agricultural Uses in Study Area

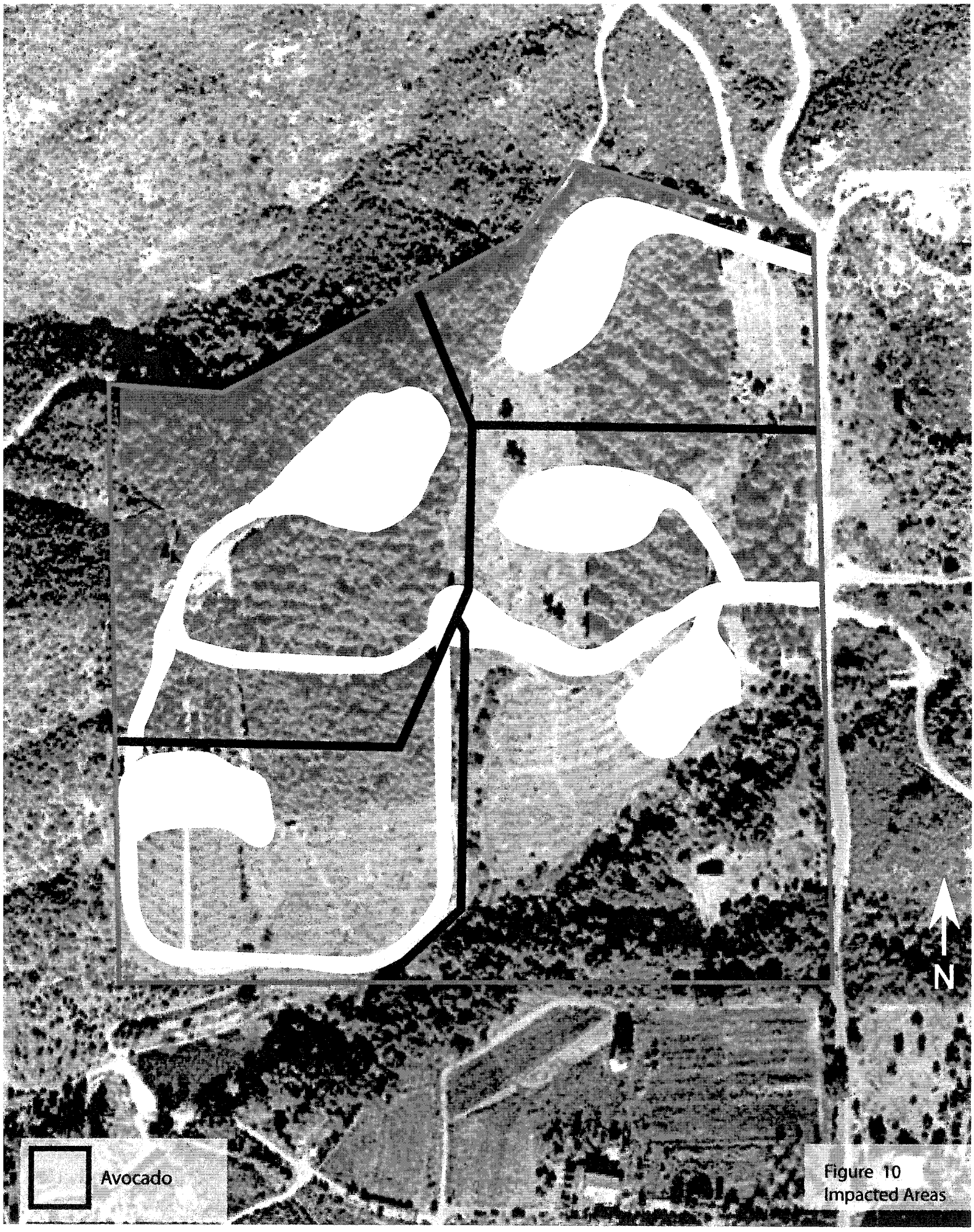

Figure 10
Impacted Areas

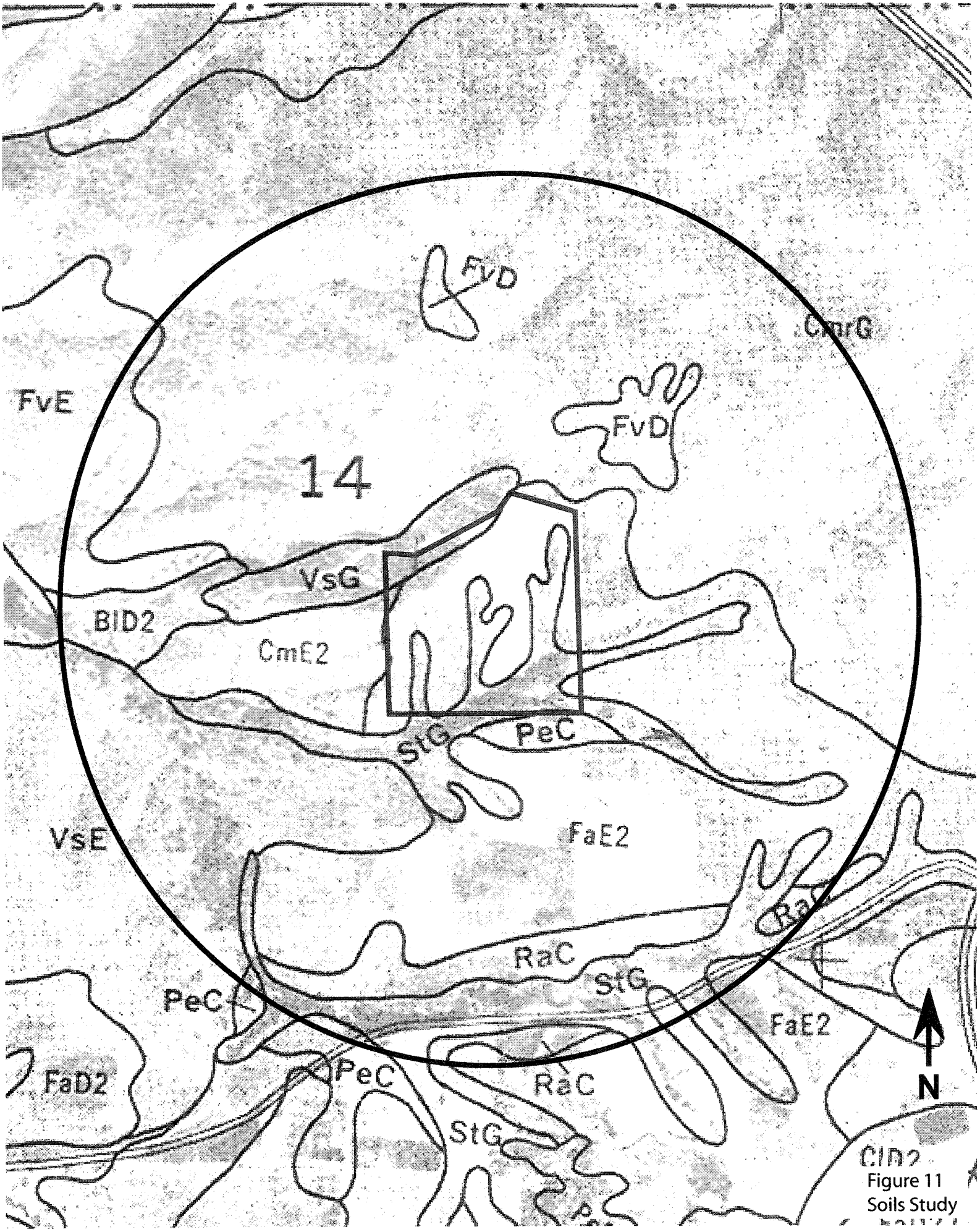

Figure 11
Soils Study

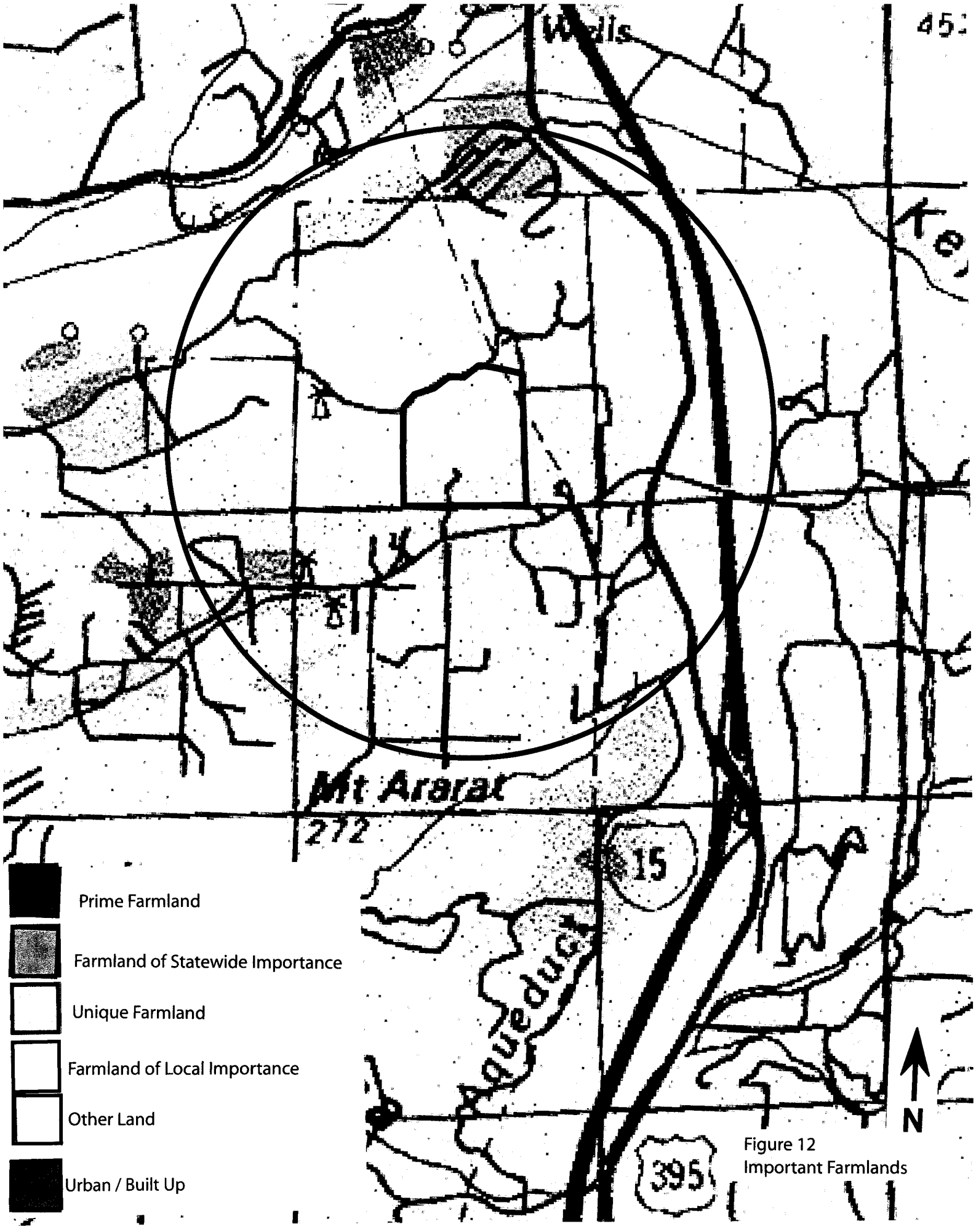

Figure 12
Important Farmlands

KATHLEEN A. THUNER
AGRICULTURAL COMMISSIONER
SEALER OF WEIGHTS
AND MEASURES

County of San Diego

DEPARTMENT OF AGRICULTURE, WEIGHTS & MEASURES
5555 Overland Ave., Bldg. 3, San Diego, CA 92123-1292

AGRICULTURE
(619) 694-2739
FAX
WEIGHTS & MEASURES
(619) 694-2776

June 2, 1997

TO: David Nagel
Department of Planning and Land Use

FROM: Kathleen A. Thuner

COMMERCIAL VIABILITY OF TWO ACRE LOTS—TM 5091 (BARRETT/HIBBARD)

Recently you contacted this office concerning the viability of two acre parcels for agriculture in the (19) Intensive Agriculture land use designation. Specifically, you requested information pertaining to the allowance for two acre parcel sizes when "the land is planted, and has been planted, for at least the previous one-year period, in one or more commercial crops that remain commercially viable on two acre lots."

The overall value of citrus per acre in San Diego County in 1996 was $5,078. For purposes of comparison, the dollar values per acre in San Diego County range from a low of about $5 (range) to a high of $588,310 (indoor decoratives).

According to our pesticide operator identification database, citrus farms in San Diego County that have registered to use pesticides are as small as 1/10th of an acre. Our records show that there are currently 671 citrus farms of two or fewer acres.

It is also important to note that "commercial viability" does not necessarily imply the ability to support oneself from income solely derived from the farm. Nationwide and in San Diego County as well, farmers traditionally have additional income from other sources. In San Diego County, only 36% of farmers list farming as their primary occupation. In California that figure stands at 52%; nationwide it is 54%.

San Diego County's 1.1 billion dollar agricultural industry is composed of many small farms—4,298 of them are nine or fewer acres. Recent trends indicate that pattern will continue. The average farm size in San Diego County has been falling and is currently only 21% of the average farm size statewide. The cost of land in the county makes it prohibitive for many new farmers to begin an operation on a large parcel, so the ability to farm small parcels is crucial to the success of future agriculture in San Diego County.

I hope this information is helpful. If you have additional questions, please contact Jennifer Tierney of my staff at (S50) 694-3122.

Sincerely,

RECEIVED

Figure XX Memorandum from the Department of Agriculture, Weights, and Measures

K.

Agricultural Commissioner/
Sealer of Weights and Measures

Figure 13

DEPT. OF PLANNING & LAND USE

FEASIBILITY TABLE

PRODUCING AVOCADOS WITH IMPORTED WATER

Revenue per acre		
Gross revenue per acre (7250 pounds @$.90/pound)		6525
Expenses per acre		
Water (3.5 acre feet or 1,140,479 gallons @ $535.91/ac ft)	1876	
Erosion control	10	
Weed control		
Round-Up	114	
Weed Whip	6	
Pruning	429	
Pollination	84	
Pest Control	285	
Pest Control Advisor	60	
Fertilizer	141	
Picking ($.16/pound)	1160	
Hauling ($.004/pound)	29	
CAC Assessment	254	
CDFA	7	
Other Overhead Costs (see sheet 2 for details)	442	
Costs including imported water per acre	4897	
Net Profit Per Acre		
Gross revenue minus costs		1628

Figure 14 Feasibility Table

FEASIBILITY TABLE

PRODUCING AVOCADOS WITH IMPORTED WATER

Sheet 2

Detailed other overhead costs from Sheet 1

Root Rot Analysis	3
Liability Insurance	37
Leaf Analysis	5
Soil Analysis	5
Sanitation Fee	22
Office Expenses	180
Investment Repairs	91
Tools	31
Irrigation System	68
Total	442

Figure 14 Feasibility Table
Page 2


LILAC RD
MT ARAR
AQUADUCT RD
CALLE DE TALAR
CALLE DE TALAR
AMIGOS RD
N
4 or Less Acre Size in Agriculture

Figure 15

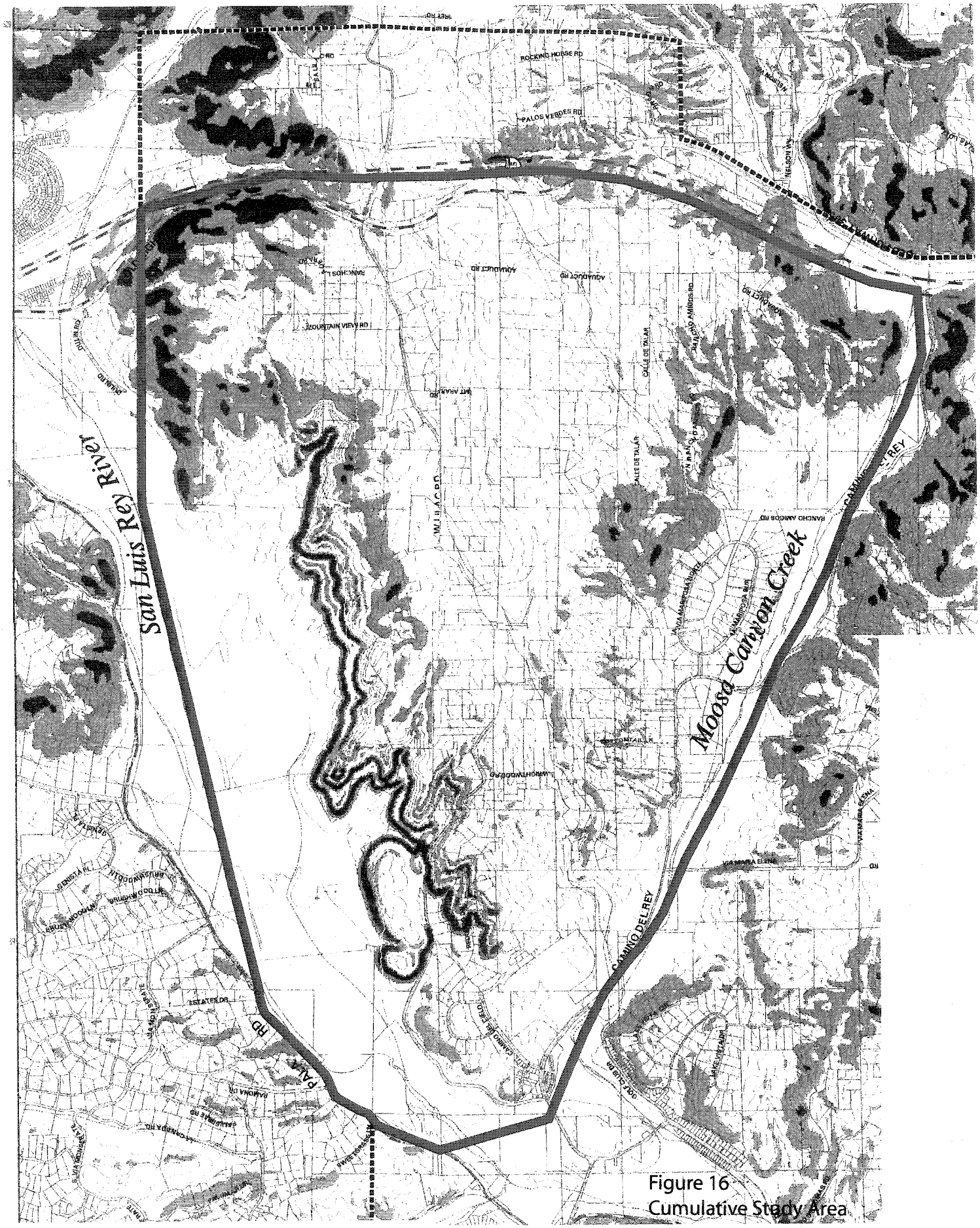

Figure 16
Cumulative Study Area

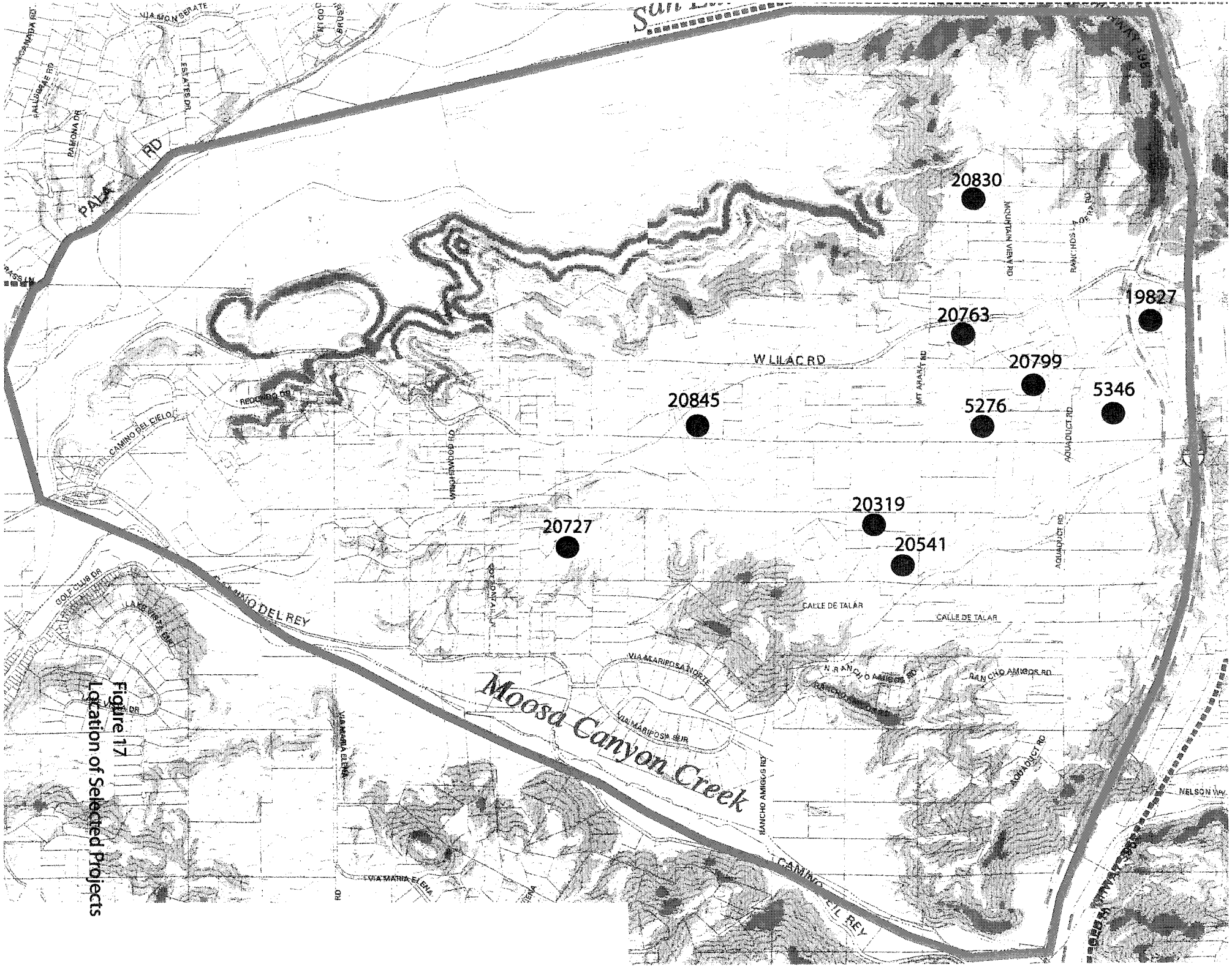

Figure 17
Location of Selected Projects

VI. STATEMENT OF QUALIFICATIONS

The following participated in this study:

James Chagala—Principal Planner

Education: B.A. in Sociology
M.S. in Urban Geography
Ph.D. in Urban Geography

Experience: 31 years as a professional planner
2 years Regional Planner with the East-West Gateway Coordinating Council
26 years with Department of Planning and Land Use
5 years as Chief of the Long Range Planning Division
10 years as Chief of the Current Planning Division
12 years as staff to the County Planning Commission
5.5 years operating a private planning consultant practice

12 years as Adjunct Professor at San Diego State University
4 years as Adjunct Professor at California State University at San Marcos

Placed on the San Diego County Environmental Consultant List in the field of Agriculture on November 14, 2001.

Eric Chagala Planning Technician
5.0 years as Planning Technician for a private planning consulting firm

APPENDIX A AREAS IMPACTED BY DEVELOPMENT BY LOTS/DRIVEWAYS

Area	Square Inches	Scale 1"=xfeet	Scale 1=xunits	Area in feet	Area in acres
				0	0
Lot 1	6.98	97.6		66489.8	1.526396
				0	0
Lot 2	4.14	97.6		39436.65	0.905341
				0	0
Lot 3	2.11	97.6		20099.35	0.461418
				0	0
Lot 4	0.63	97.6		6001.229	0.137769

APPENDIX B

Applications filed within the Potential Cumulative Impact Area.	Applications on Agricultural or Disturbed Lands.	Applications on Agricultural or Disturbed Lands and Classified as one of the Principal Farmlands.
20830*	20830*	20830*
20845	20845	20845
19827	19827	19827
20799	20799	20799
5346	5346	5346
5276	5276	5276
20763	20763	20763
72-618 (MUP)	72-618	72-618
20541	20541	20541
04-016** (MUP)	04-016**	04-016**
20727	20727	
20319	20319	
5352	5352	
04-032 (MUP)	04-032	
03-097 (MUP)	03-097	
4793	4793	
5387		
4956		
20619		
5334		
03-113 (MUP)		

*Subject Property
** = "Cell Site" not needing to be included in report

APPENDIX C

ACREAGE AFFECTED BY SELECTED PROJECTS

Project Number	Project Type	Acreage
20541	Minor Subdivision	8.26
20845	Minor Subdivision	5.89
19827	Minor Subdivision	12.08
20799	Minor Subdivision	11.47
5346	Major Subdivision	37.2
5276	Major Subdivision	92.77
20763	Minor Subdivision	3.33
72-618	Major Use Permit	9.1
Total		180.1

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Written Works:

County of San Diego, Department of Weights and Measures, 2002 Crop Statistics & Annual Report

University of California, Agricultural Extension Service. Climates of San Diego County—Agricultural Relationships, November 1970.

United States Department of Agriculture, Soil Conservation Service and Forest Service. Soil Survey San Diego Area, California. December 1973

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance—San Diego County

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. 2000-2002 Land Use Conversion, Table A-26, San Diego County.

www.Avocado.org. Website for the California Avocado Commission.

Maps:

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. San Diego County Important Farmland 2002

County of San Diego, Department of Public Works, Mapping Section. Bonsall Community Plan.

County of San Diego, Department of Public Works, Mapping Section. County of San Diego General Plan—Regional Land Use Element Map,

County of San Diego, Department of Public Works, Mapping Section. County of San Diego—Agricultural Preserves.

SanGis, County of San Diego General Plan 2020 Reference Maps for Bonsall as Follows:

Parcelization
Vegetation
Topography
Bonsall Discretionary Project Status, August 2004